

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Alexander Norris,

Plaintiff,

- against –

Marc Goldner, Individually and as Officer of
Golden Bell Entertainment, LLC, a California
Company and Golden Bell Studios, LLC,
Golden Bell Entertainment, LLC, a California
Company and Golden Bell Studios, LLC,

Defendants.

Civil Action No.: 1:19-cv-05491-PAE-SN

**Declaration Of Christie R. McGuinness In Support Of Plaintiff's Motion For Statutory
Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976**

I, Christie R. McGuinness, hereby declare and state as follows:

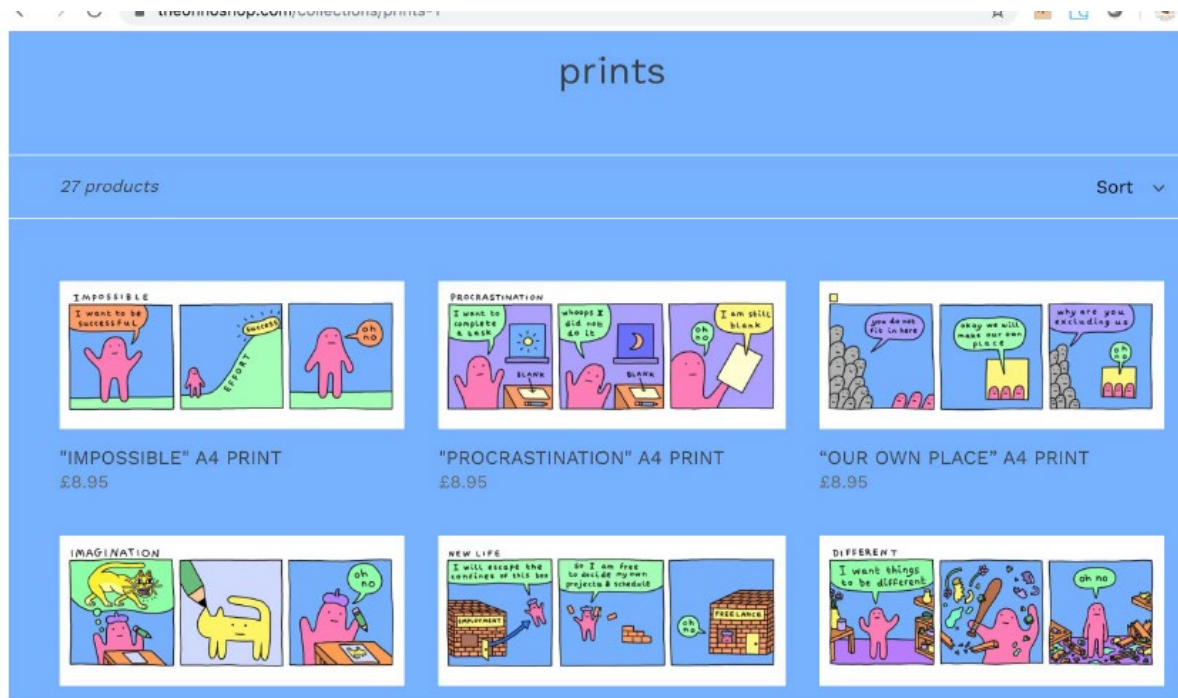
1. I am associated with the law firm Saul Ewing LLP, attorneys for Plaintiff Alexander Norris ("Plaintiff") in the above-caption matter.
2. I submit this Declaration In Support Of Plaintiff's Motion For Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976 (the "Motion").
3. All exhibits annexed hereto are referenced in Plaintiff's Memorandum of Law submitted in support of the Motion.
4. Annexed hereto as **Exhibit 1** is a true and accurate copy of the specimen of use for Application Serial No. 88147369 (the "369 Application").
5. Annexed hereto as **Exhibit 2** is a true and accurate copy of the list of the documents filed with the United States Patent and Trademark Office ("USPTO") indicating that on May 18, 2020, Defendants filed a specimen of use for the 369 Application.
6. Plaintiff's Copyrighted Works appear in the 369 Application screenshot below:



7. Annexed hereto as **Exhibit 3** is a true and accurate copy of the specimens of use for Application Serial No. 88975215 (the “215 Application”).

8. Annexed hereto as **Exhibit 4** is a true and accurate copy of the list of documents filed with the USPTO indicating that on November 18, 2019, Defendants filed the specimens of use for the 215 Application.

9. Plaintiff's Copyrighted Works, as shown in the screenshot below, appear in the specimen that Defendants submitted to the USPTO in support of the 215 Application:

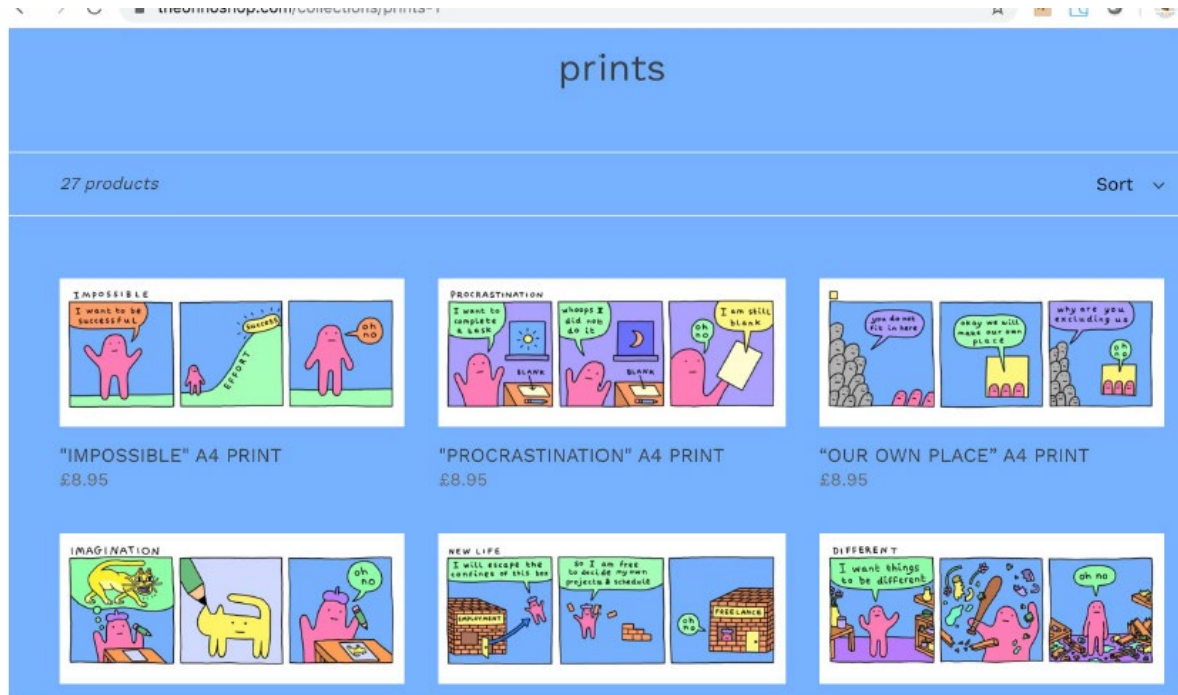


10. Annexed hereto as **Exhibit 5** is a true and accurate copy of the specimens of use that Defendants submitted in support of Application Serial No. 88185795 (the "795 Application").

11. Annexed hereto as **Exhibit 6** is a true and accurate copy of the list of documents filed with the USPTO indicating that on November 18, 2019, Defendants filed with the USPTO the specimens of use in support of the 795 Application.

12. Plaintiff's Copyrighted Works, as shown in the screenshot below, appear in the 795 Application:

[Space Left Intentionally Blank Due To Size Of Screenshot]



I hereby declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this the 22nd day of December, 2023 in New York, New York.

/s/ Christie R. McGuinness

Christie R. McGuinness

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Attorneys for Plaintiff

Alexander Norris

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Declaration of Christie R. McGuinness in Support Of Plaintiff's Motion For Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976 was filed with the Clerk on this date and sent to all counsel via CM/ECF as follows:

Gerard Fox, Esq.
Kathryn Lunn, Esq.
GERARD FOX LAW P.C.
1880 Century Park East, Suite 1410
Los Angeles, California 90067
Counsel for Defendants
Marc Goldner, Golden Bell Entertainment, LLC and Golden Bell Studios, LLC

This the 22nd day of December, 2023.

/s/ Christie R. McGuinness
Christie R. McGuinness